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RCRA PERMITTING & COMPLIANCE BRANCH
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STATE OF MISSOURI

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DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

November 25, 1996

CERTIFIED MAIL - P 331 194 395
RETURN RECEIPT REQUESTED

Mr. Thomas S. Sanicola
Environmental Engineer
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403

RCRA Records Center

R00041265



RE: Modine Heat Transfer, Inc., Camdenton, Missouri
EPA ID #: MOD062439351

Dear Mr. Sanicola:

The Missouri Department of Natural Resources, Hazardous Waste Program (HWP), has received your October 8, 1996, letter enclosing the deed notification and survey plat for Modine Heat Transfer (Modine) located on Sunset Drive, Camdenton, Missouri. In accordance with 10 CSR 25-7.265(1) incorporating by reference 40 CFR 265.115, Modine shall submit a closure report indicating that the facility has been closed in accordance with the approved closure plan and all approved modifications thereafter. The report shall be certified by the owner of the facility and an independent professional engineer licensed in the state of Missouri and received within 30 days of your receipt of this letter.

In previous meetings with Modine, the issue of groundwater contamination at the Camdenton facility was discussed at length. These discussions were generally technical in nature and focused primarily on recent supplemental groundwater-related information and data collected voluntarily by Modine. Based on these discussions, it was the HWP's understanding that Modine had agreed that continued "voluntary" corrective action, including groundwater monitoring, would be conducted by Modine. This would, in turn, eliminate the need for the HWP to invoke post-closure monitoring under 40 CFR Part 265 Subpart F as incorporated by reference in 10 CSR 25-7.265(1).

In your letter to Mr. Richard Nussbaum of the HWP dated November 4, 1996, it is indicated that Modine voluntarily investigated the former city wastewater treatment pond as a potential source for the groundwater contamination at the

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Camdenton facility. While this action is commendable, the HWP is concerned that Modine's letter of September 23, 1996, suggests that no further investigation work will be performed now that the pond investigation has been completed. The HWP believes that this is inconsistent with the spirit of the agreements previously reached between the HWP and Modine. Given Modine's apparent position with respect to further investigation, the following potential implications of this position should be considered.

Despite the findings of the pond investigation, a definitive linkage between the groundwater contamination and the closed container storage area (i.e., regulated unit) or some other source (i.e., one or more of the Solid Waste Management Units identified in the RCRA Facility Assessment Report) has not been established. Due to this and Modine's position with respect to further voluntary investigation (including continued groundwater monitoring) the HWP may have no choice but to require Modine to conduct quarterly assessment monitoring in accordance with 40 CFR Part 265 Subpart F as incorporated by reference in 10 CSR 25-7.265(1) under a post-closure plan. Under this scenario, post-closure groundwater monitoring would have to be conducted until a final determination on corrective action at the Camdenton facility is completed.

Modine is hereby advised that the HWP is currently preparing an evaluation of the groundwater monitoring program at the Camdenton facility relative to the requirements of 40 CFR Part 265 Subpart F. This evaluation will form the basis for Modine to upgrade the current groundwater monitoring program, if necessary, to meet these requirements. A copy of the final evaluation report will be transmitted to Modine when it has been completed.

It is recommended that Modine carefully consider its regulatory options at the Camdenton facility. Within 30 days of receipt of this letter, Modine shall submit to the HWP either a written commitment to perform further "voluntary" investigation (including continued groundwater monitoring) or a post-closure plan which includes specifications for quarterly groundwater monitoring and a cost estimate for post-closure care. If Modine opts to enter into post-closure, financial assurance shall be established for post-closure care within 60 days of approval of the post-closure plan in accordance with 10 CSR 25-7.265(2) (H) and 40 CFR Part 265 Subpart H as incorporated by reference in 10 CSR 25-7.265(1).

If you have any questions regarding the closure certification or closure report, please contact Ms. Darleen Westcott, Environmental Engineer, at (573) 751-3176. If you have any

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questions regarding post-closure groundwater monitoring, please contact Gene Williams, P.E., Environmental Engineer, at the same number.

Sincerely,

HAZARDOUS WASTE PROGRAM



Ed Sadler
Director

ES:dws

c: Bob Stewart, P.E., U.S. EPA Region VII ✓
MDNR, Jefferson City Regional Office